



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, Ca. 94105

Certified Mail # P 460 807 000  
Return Receipt Requested

In Reply H-4-4

Refer to:

EPA ID # CAD 009 198 367

OUT 13 1991

Mr. Bob Cook  
Campbell Soup Company  
6200 Franklin Boulevard  
Sacramento, California 95824

Dear Mr. Cook:

Ecology and Environment, Incorporated has completed a Preliminary Assessment (PA) of Campbell Soup Company on behalf of the Environmental Protection Agency (EPA). During this investigation, Ecology and Environment, Incorporated gathered information in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA) of 1976. A copy of the PA report is enclosed for your records.

EPA routinely provides copies of investigation reports to State agencies, and upon request, to the public. EPA handles such releases according to the regulations governing business confidentiality claims (40 C.F.R. Part 2). You should make any claim of confidentiality within fifteen (15) working days of the receipt of this letter. EPA will construe a failure to furnish a timely claim as a waiver of the confidentiality claim. Any claim of confidentiality should identify the specific pages or portions of pages of the PA report which are considered confidential and should also give a detailed explanation of the basis for such a claim.

If you have any further questions regarding this report, please contact Nancy Nadel of the RCRA Corrective Action Section at (415) 744-2043.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Lindsay".

Nancy Lindsay, Chief  
RCRA Corrective Action Section

Enclosure

cc: Megan Cambridge, DHS-TSCP  
Bill Crooks, RWQCB

R E P O R T   T R A N S M I T T A L

Date delivered to H-8-1: 8-27-91

*CBI Claim is pending.*

Copies of this RCRA Preliminary Assessment for Campbell Soup Company should be sent to the following agencies and individual:

*Releasable*

Campbell Soup Company  
6200 Franklin Boulevard  
Sacramento, California 95824  
ATTN: Bob Cook

*Not  
releasable*

California Regional Water Quality Control Board  
Central Valley Region  
3443 Routier Road, Suite A  
Sacramento, California 95827-3098  
ATTN: Bill Crooks

*Not  
releasable*

California Department of Health Services TSCP  
Site Mitigation Branch, Site Evaluation Unit  
10151 Croydon Way, Suite 3  
Sacramento, California 95827  
ATTN: Megan Cambridge

*Releasable, H-8-1  
9.17.91*

ENVIRONMENTAL PRIORITIES INITIATIVE  
PRELIMINARY ASSESSMENT

Purpose: RCRA Preliminary Assessment

Site: Campbell Soup Company  
6200 Franklin Boulevard  
Sacramento, California  
Sacramento County

Site EPA ID Number: CAD009198367

TDD Number: F9-9105-006

Program Account Number: FCA1765RAA

FIT Investigators: Juliet Shin  
Kira Pyatt

Date of Inspection: June 6, 1991

Report Prepared By: Juliet Shin *JS*

Report Date: August 16, 1991

Through: Kate Dragolovich *KD*

FIT Review/Concurrence: *James M. James* 8/16/91

Submitted To: Rachel Loftin  
Site Assessment Manager  
EPA Region IX



ecology and environment, inc.

160 SPEAR STREET, SAN FRANCISCO, CALIFORNIA 94105, TEL. 415/777-2811

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## 1. INTRODUCTION

As part of its Environmental Priorities Initiative (EPI) program, the U.S. Environmental Protection Agency (EPA) has requested Ecology and Environment, Inc.'s Field Investigation Team (E & E FIT) to conduct a Preliminary Assessment (PA) of the Campbell Soup Company site, located at 6200 Franklin Boulevard, Sacramento, California.

The EPI program integrates the Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA) with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), in order to set priorities for cleanup of the most environmentally significant sites first. The Preliminary Assessment is conducted using CERCLA Hazard Ranking System (HRS) criteria to determine the site's eligibility for inclusion on the National Priorities List and, thus, assists in prioritizing facilities for the RCRA program.

## 2. SITE DESCRIPTION

### 2.1 SITE LOCATION AND OWNER/OPERATOR HISTORY

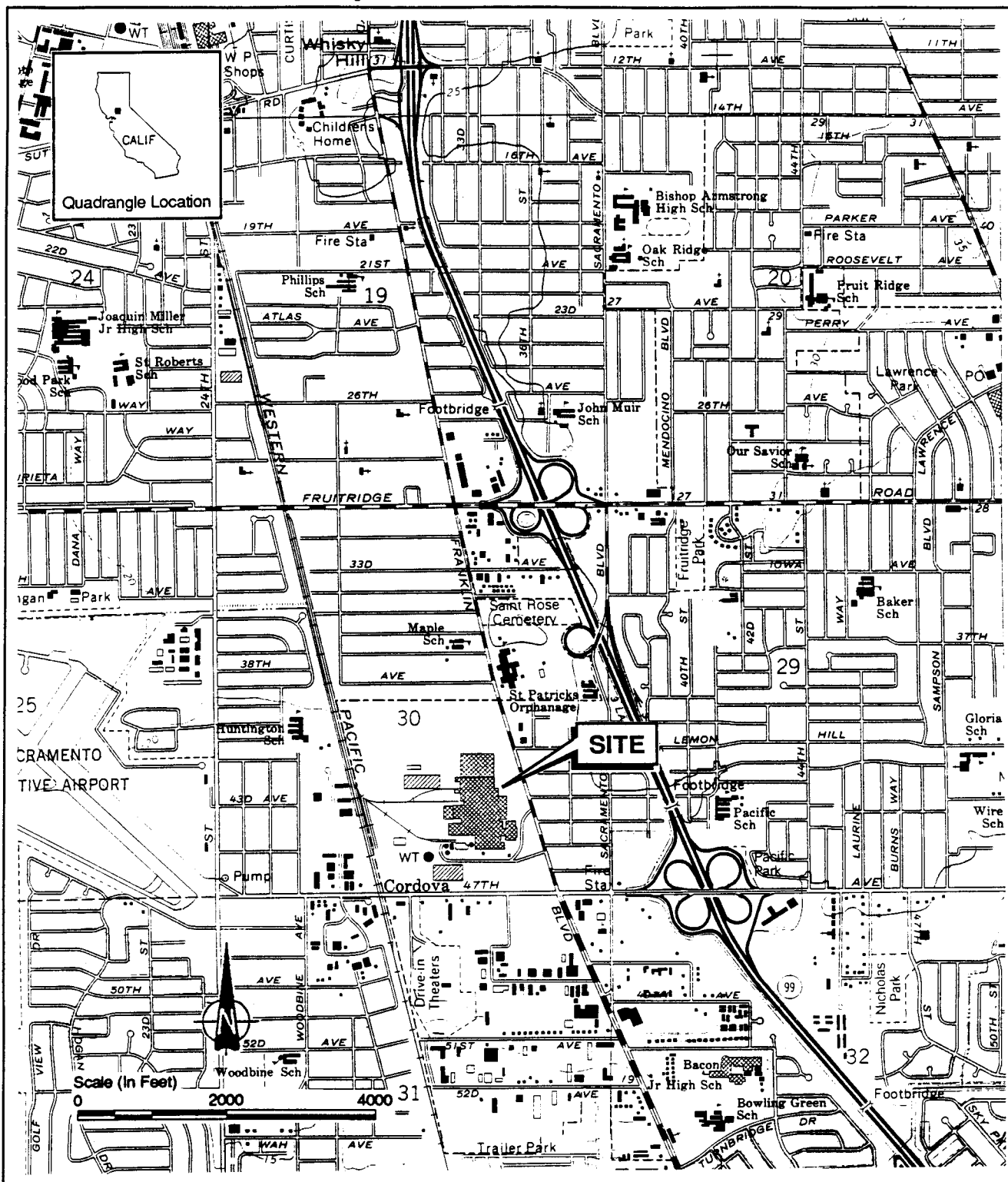
The Campbell Soup Company (Campbell Soup) site is located at 6200 Franklin Boulevard in the City of Sacramento, California (T. 8 N., R. 5 E., sec 31, Mount Diablo Baseline and Meridian, lat. 38°30'31"N., long. 121°27'8"W.) (see Figure 1) (1,3). The site covers approximately 123 acres in a mixed commercial and residential area (3). It consists of a general manufacturing building, two warehouses, and a 17-acre undeveloped field (4,5,6). Campbell Soup is bordered on the east by Franklin Boulevard, on the south by 47th Avenue, on the west by Western Pacific Railroad, and on the north by 39th Avenue (4).

The Campbell Soup facility has been at the site since 1948. Prior to this, the site was apparently an open field. Campbell Soup's headquarters are in Camden, New Jersey (4).

### 2.2 FACILITY PROCESSES/WASTE MANAGEMENT

Campbell Soup produces convenience food and juices at the site. The majority of hazardous wastes produced at the site result from packaging operations for the facility's line of food products (7). Solvent-based enamel wastes were generated at the site from the can manufacturing department until early 1991. These wastes were stored in drums in the hazardous waste storage area. The facility currently generates water-based enamel wastes from the can manufacturing process (4). Solvents used in the enameling of cans are reused until their percentage composition drops below an effective level (2). The spent solvents are then drummed and stored in the Hazardous Waste Storage Area. Approximately 55 55-gallon drums of solvent waste accumulate at the site over a seven- to eight-month period (4). The solvent waste is then transported and recycled by Romic Chemical Corporation (EPA ID#: CAD009452657) and American Environmental Management Corporation (EPA ID#: CAD980884183) (2,4).

Source: U.S.G.S. 7.5' Sacramento East Quadrangle



ecology and environment, inc.

Figure 1

SITE LOCATION MAP  
Campbell Soup Company  
6200 Franklin Blvd.  
Sacramento, CA

Waste oils are generated at the site from the maintenance of equipment. They are stored in drums before being sent to a local recycler, Ramos Oil, in Sacramento (4).

There are a number of satellite collection areas for waste oil and enamels located in buildings throughout the site (see Figure 2). Once the 55-gallon drums located in these areas are full, they are taken to the hazardous waste storage area (4).

Other hazardous wastes generated at the site include spent batteries, Vedeo Jet Ink, asbestos, tank-bottom wastes (i.e., salt impurities that settle out in the facility's salt brine system), and polychlorinated biphenyls (PCBs). For further information about the generation and storage of these wastes, refer to section 4.1 (4).

Campbell Soup used to dispose of a portion of its tomato process wastewater onto a 17-acre field on site (5). Campbell Soup no longer discharges tomato wastewater on site (4,8).

### 3. REGULATORY INVOLVEMENT

#### 3.1 U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)

The Campbell Soup site is listed in the May 1990 Resource Conservation and Recovery Act (RCRA) database as a generator, and as a Treatment, Storage, Disposal Facility (TSDF). Campbell Soup's RCRA notification was entered into the RCRA database on August 18, 1980. The Part A permit application was submitted to EPA on November 7, 1980 (14).

#### 3.2 CALIFORNIA DEPARTMENT OF HEALTH SERVICES (DHS)

The facility was granted an Interim Status Document (ISD) on March 30, 1981, and on April 6, 1987 Campbell Soup was issued its current Hazardous Waste Facility Permit (2,15). The facility completed an Operation Plan which was submitted to DHS on June 6, 1983, and revised on June 7, 1985 (7). Campbell Soup is currently working with DHS to withdraw its TSDF status (16). Campbell Soup submitted a Closure Plan in 1987, which has been approved by DHS (49). Campbell Soup reportedly requested withdrawal of its TSDF status in a letter to DHS on November 20, 1990. The facility plans to begin storing hazardous wastes on site for less than 90 days (4).

DHS inspected the Campbell Soup facility on the following dates: September 23, 1981; May 27, 1982; November 17, 1982; January 14, 1983; August 2, 1983; May 29, 1985; May 10, 1986; January 29, 1987; August 23, 1988; and October 23, 1990 (2,3,17,18,19,20,21,22,23). During the October 23, 1990 inspection, DHS noted that Campbell Soup had five drums of hazardous waste which did not have start-of-accumulation dates (2). On November 17, 1982, DHS noted violations at the site concerning the use, storage, and disposal of PCBs. Active storm drains were observed at Transformer Substations 2 and 9. A tar-like residue was observed under a transformer drain valve located at Substation 6. A sample of the residue was taken; however, results of the sampling could

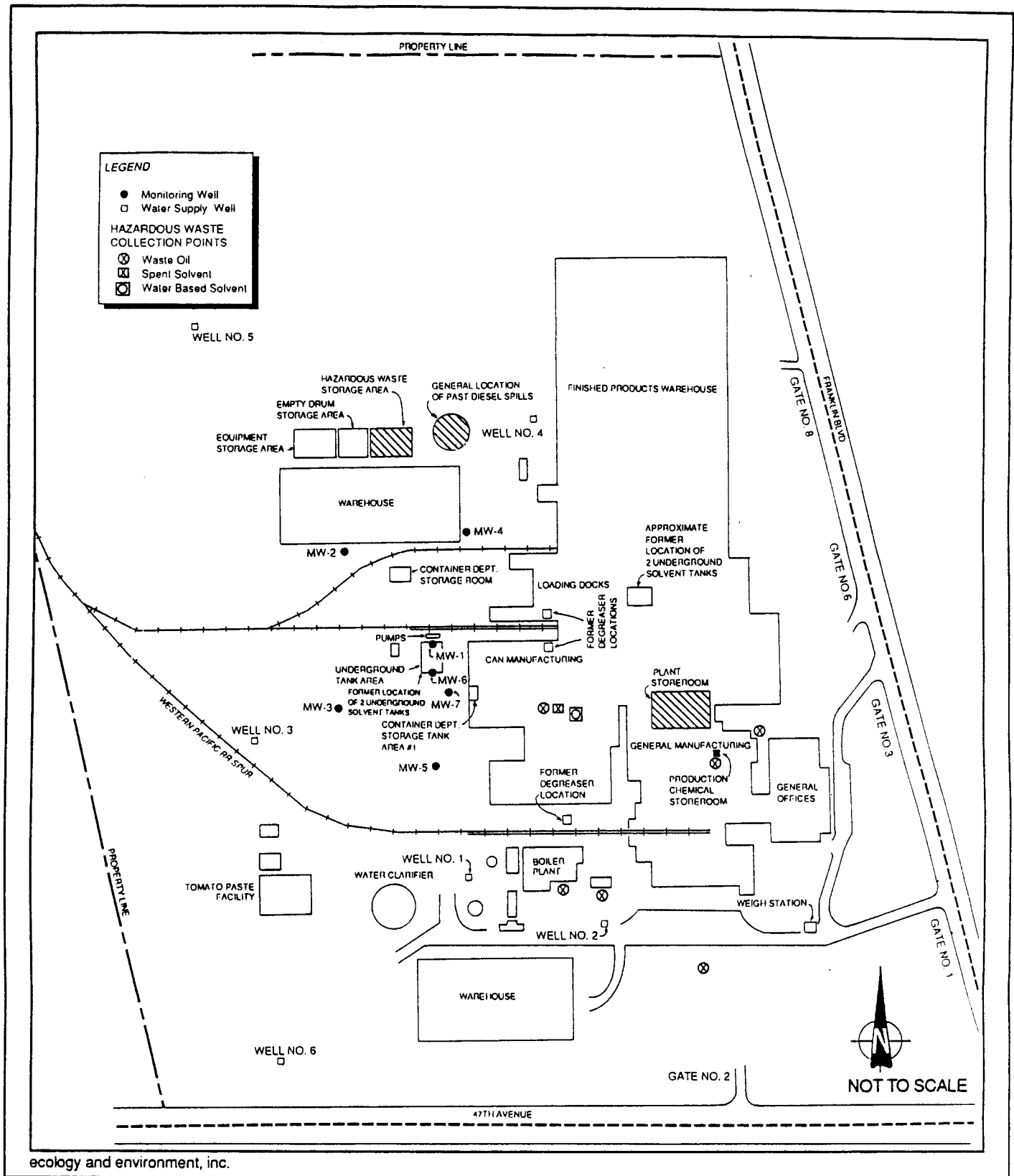


Figure 2  
FACILITY MAP  
Campbell Soup Company  
6200 Franklin Boulevard  
Sacramento, California

not be located by FIT (23). All items of noncompliance noted in the November 17, 1982 inspection report were subsequently corrected (24).

### 3.3 REGIONAL WATER QUALITY CONTROL BOARD (RWQCB)

On April 8, 1986, RWQCB entered into an agreement with County Health to study regional groundwater contamination. As part of this study, RWQCB has overseen bimonthly sampling of water supply wells at the Campbell Soup site (9,11).

On May 20, 1988, RWQCB issued Waste Discharge Requirement Order No. 88-083 to Campbell Soup to dispose of approximately 50,000 gallons per day of tomato process wastewater onto a 17-acre on-site field (5).

### 3.5 OTHER AGENCY INVOLVEMENT

The Sacramento County Air Pollution Control District has issued 13 permits to the facility: #477-#480; #482-#485, #564-#566; and #2435 and #2436 (14).

The Regional Sacramento County Sanitation District issued Campbell Soup an Industrial Sewer Use Permit on April 22, 1987 (25).

The Campbell Soup site has a National Pollutant Discharge Elimination System (NPDES) permit, issued on February 9, 1988. According to representatives of Campbell Soup, this permit allows for the discharge of cooling water from the heat exchangers into the storm drains (4).

The Sacramento County Environmental Health Department (County Health) issued Campbell Soup a Hazardous Materials Permit on July 1, 1990. County Health conducted an inspection at the site for the above permit on May 24, 1990. At that time, County Health noted that the hazardous waste drums were not labeled properly and that some hazardous waste drums did not have lids. County Health issued a permit to the facility, in approximately 1988, for one 1,000-gallon underground product Stoddard solvent tank. County Health inspects the site once a year because of this underground tank (26).

In May 1989, four underground tanks, that were used for the storage of solvent-based enamel product, were closed, removed, and transported off site under the supervision of County Health. Excavated subsurface soil that had been surrounding the tanks was sampled. Results indicated the presence of xylene and ethyl benzene. This soil contamination was most likely the result of a spill that occurred in 1987 when a pipeline connected to one of the underground tanks leaked. During the 1989 tank removal effort, soil samples were also collected from the boundaries of the excavation. Benzene, toluene, xylene, ethyl benzene, and total petroleum hydrocarbons were not detected in the samples (13).

In 1990, diesel fuel spilled onto bare soil when a pump was left unattended. Approximately 20 to 30 gallons of diesel were spilled (see Figure 2 for general location of spill). The cleanup was approved by County Health (2,4). Another diesel spill occurred in 1987 at the site. Three hundred gallons of diesel flowed into the bermed containment area



around the diesel tanks (2,48). However, sections 101(14) and (33) of CERCLA exclude petroleum from the definitions of "hazardous substance" and "pollutant or contaminant."

#### 4. DESCRIPTIONS OF INDIVIDUAL SOLID WASTE MANAGEMENT UNITS

Distinct Solid Waste Management Units (SWMUs) have been identified to evaluate potential on-site sources of releases to air, surface water, groundwater, and soil. A SWMU is defined as any discernible waste management unit at a facility from which hazardous constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste. As a result of this Preliminary Assessment, FIT has identified one significant SWMU at the site. It appears that this unit, the hazardous waste storage area, is RCRA-regulated. Additional SWMUs may exist.

##### 4.1 HAZARDOUS WASTE STORAGE AREA

Unit Description: After collection at various locations in the plant, wastes are stored in the hazardous waste storage area. This area consists of a corrugated metal building that covers a concrete-paved area that is surrounded by a 6-inch berm. The maximum capacity of the hazardous waste storage area is 200 55-gallon drums. This area covers approximately 3,000 square feet (4,27). Wastes are stored in 55-gallon drums in this area for more than 90 days, prior to being transported off site (4). The drums are stacked on top of one another with wooden pallets placed between the different levels of drums (28).

Date of Start-up: The current Hazardous Waste Storage Area has been in use since 1985 or 1986. Before that time, the hazardous waste drums were stored outside on a concrete pad located in the same general area (4).

Date of Closure: The hazardous waste storage area is currently in use (4).

Waste Managed: Spent solvent-based and water-based enamels, spent solvents, waste oils, spent batteries, spent Vedeo Jet Ink, and PCBs are stored in the hazardous waste storage area (2,4,17).

Solvent-based enamel wastes were generated until early 1991 (4). They consisted of methyl ethyl ketone (MEK), methyl isobutyl ketone (MIK), and butanol (2,29). The facility currently uses water-based enamel (4).

Five to 10 gallons per month of Vedeo Jet Ink, containing MEK, is generated from the labeling process. The spent Vedeo Jet Ink is hauled away by Romac Chemical Corporation. Waste oils are generated from the maintenance of equipment (4).

Used forklift and car batteries are stored in the hazardous waste storage area and then either traded in for new batteries or sold to a recycler (4,17). In the past, the battery acids were disposed of at Chemical Waste Management's facility in Kettleman Hills (EPA ID#: CAT000646117) (18).

Light ballasts containing PCBs are collected in a 35-gallon drum which is stored in the hazardous waste storage area, prior to being transported off site to Kettleman Hills (4).

DHS listed tank-bottom wastes as being generated at the site (2). The tank-bottom wastes refer to salt impurities that settle out in the facility's salt brine system. Campbell Soup does not feel that it needs to haul the salt impurities as waste. Romic Corporation is currently sampling the material to determine if it needs to be hauled as waste. This waste was formerly drummed and stored in the hazardous waste storage area and was transported off site by American Environmental Management Corporation and IT Corporation. Currently, this waste is stored in drums immediately outside of the hazardous waste storage area (4).

Release Controls: The current hazardous waste storage area consists of a corrugated metal building that covers a concrete-paved area that is surrounded by a 6-inch berm. In the past, the hazardous waste storage area was located outside on a concrete pad in the same general area. It is unknown if this area was fenced or bermed (4,28).

History of Releases: There has been no known sampling in this area.

#### 4.2 AREAS OF CONCERN

In 1985, DHS reported that a small amount of solvent waste was being stored in drums in the Parts Storage Area in the plant storeroom. DHS noted that fumes were coming from this area (19,30). This area probably stored up to six 55-gallon drums of spent solvent at one time. Campbell Soup stopped storing drums in this area approximately three years ago (4).

There are two caustic tanks on site: one 4,000-gallon tank and one 5,000-gallon tank. These tanks are used to store sodium hydroxide and chlorine which the facility receives in bulk quantity. These tanks are inspected by California Office of Occupational Safety and Health Administration (OSHA) (see Figure 2). In the event of a spill, the caustic would be contained within a basalt block, concrete-filled containment dike (30,31).

Empty drums--previously containing enamel, oil, and grease--are stored in a 150-square-foot area adjacent to the hazardous waste storage area. FIT does not have information as to whether these drums were cleaned prior to storage. This area is situated on a raised concrete pad, and is fenced on three sides (4).

Three plant degreasers were located on the site in the past. The start-up and removal dates of these degreasers is unknown (see Figure 2). The degreasers were approximately 12 feet by 5 feet by 6 feet high. To degrease machine parts, a 55-gallon drum of trichloroethene (TCE) was dumped into the tank and steam was used to heat the solvent. The heated solvent was then used to clean the parts. The major portion of the evaporated solvent was returned to the holding tank after being condensed by the water jacket. After the parts were degreased and still in the tank, the parts were sprayed with solvent from the holding tank. When

the degreasing operation was completed, all of the solvent left in the degreaser was pumped into a 55-gallon drum for storage and reuse during the next cleaning operation. The annual usage of TCE for degreasing operations was approximately seven drums. Except for a report describing the burial of two drums in the area south of the 4th shift Maintenance shop (250 feet southeast of No. 2 deep well), there are no other records describing disposal practices (32).

An insecticide, Cardinal S.F.-1, is stored in the pesticide storage building on site and is used to control insects at the facility. A maximum of 550 gallons of this insecticide may be stored in the pesticide storage building. Methyl bromide is also stored in the pesticide storage building and is used for fumigation (4).

Pipes within the Campbell Soup building are insulated with asbestos (2). Campbell Soup is removing the asbestos as needed (e.g., when piping needs to be removed or when there are modifications to the building). Removed asbestos is stored adjacent to the hazardous waste storage area, on the east side, in a trailer (see Appendix B for photographs) (4).

Contaminated soil may still exist on site as a result of the 1987 spill that occurred from a leaking pipeline connected to an underground tank containing solvent-based enamel product (see section 5.2 for details concerning the spill) (12). Although the underground tank was removed in 1989, and some contaminated soil was excavated, it is unknown to FIT if the excavated area was extensive enough to result in a complete cleanup (13).

## 5. HRS FACTORS

The Hazard Ranking System (HRS) is a scoring system used to assess the relative threat associated with actual or potential releases of hazardous substances from sites. It is the principal mechanism EPA uses to place sites on the National Priorities List (NPL). FIT has evaluated the following HRS factors relative to this site.

### 5.1 WASTE TYPE AND QUANTITY

Hazardous wastes at the site are generated from packaging operations and maintenance of machinery (4,7). The hazardous waste storage area has a maximum capacity of 200 55-gallon drums. The drums contain light ballasts containing PCBs; spent forklift batteries; solvent-based enamel wastes, which consist of MEK, MIBK, and butanol; and waste oil. In addition, until 1991, six 55-gallon drums of spent solvent were stored in the parts storage area. Removed asbestos is stored in a trailer on site. Contaminated soil apparently still exists on site as a result of a 1987 spill (2,4). The spill occurred from a leaking pipe connected to an underground tank containing solvent-based enamel product. Benzene, ethyl benzene, toluene, and xylene have been detected in soils in the area of the spill (12). See section 4 for details regarding waste sources.

## 5.2 GROUNDWATER

The Campbell Soup site is located in the southeast corner of the Sacramento Valley. The valley is bounded on the west by the Coast Ranges, on the northeast by the Cascade Range, and on the east by the Sierra Nevada (33). The subsurface geology of the area consists of alluvial deposits of poorly bedded siltstones, clays, and lenticular sandstones that do not form any clearly defined confining layers. The two most superficial water-bearing formations are the Victor and Fair Oaks formations (34). The regional groundwater gradient is predominantly in a southeasterly direction. Depth to groundwater at the site is approximately 50 feet. The underlying soils at the facility are predominantly medium to fine silty sands with discontinuous lenses of clayey silts and coarse gravels (5,12).

It appears that hazardous substances from the site have been released to groundwater. During 1987 and 1988, as part of a regional groundwater contamination study, County Health and RWQCB sampled four water supply wells on site. Analytical results of these efforts identified up to 4.8 micrograms per liter ( $\mu\text{g/L}$ ) TCE in the on-site water supply well #2, which is located hydraulically downgradient of the processing plant. TCE has not been detected in three other on-site water supply wells which are located hydraulically upgradient of the processing plant. The four water supply wells are screened at comparable levels ranging from 100 to 400 feet below ground surface (9). TCE was used at the facility for parts cleaning until September 1984 (10). In addition, two drums of TCE may have been buried 250 feet southeast of water supply well #2 (11).

In 1987, a spill occurred from a leaking pipeline connected to an underground tank containing solvent-based enamel product. Campbell Soup repaired the pipeline and leak-tested the tank and pumping equipment. Thirty cubic yards of contaminated soil were excavated and transported to a Class I disposal facility. The excavated area was then resurfaced with cement. Six monitoring wells were then installed in the area where the pipe leak had occurred. During the drilling of monitoring well MW-1, soil samples were collected and the analytical results indicated the presence of benzene at 250 micrograms per kilogram ( $\mu\text{g/kg}$ ), ethyl benzene (68,500  $\mu\text{g/kg}$ ), toluene (3,400  $\mu\text{g/kg}$ ), and xylene (237,000  $\mu\text{g/kg}$ ). Up to 2,280  $\mu\text{g/L}$  xylenes, 16  $\mu\text{g/L}$  toluene, 2  $\mu\text{g/L}$  benzene, 250  $\mu\text{g/L}$  ethyl benzene, 1.6  $\mu\text{g/L}$  trichloroethane (TCA), and 1.6  $\mu\text{g/L}$  tetrachloroethene (PCE) have been detected in groundwater samples collected from monitoring wells MW-1 and MW-2 (12).

There are three municipal drinking water systems located within 4 miles of the site: The City of Sacramento Municipal System, the Fruitridge Valley Water Company, and the Florin County Water System. The Sacramento Municipal System currently operates 43 wells which serve approximately 340,000 people. Seventeen percent of the water supplied by this system comes from groundwater, and the rest comes from surface water intakes (35). The Fruitridge Valley Water Company operates 15 wells and serves 4,625 connections (37). The Florin County Water Department operates nine wells which serve approximately 2,209 connections (36). It was estimated that there are 2.41 people per household in Sacramento (40). Groundwater in the

Fruitridge Valley and Florin County water systems is not blended with any other source before being distributed to customers (36,37).

Groundwater is used at the site for food processing. Additionally, groundwater within 4 miles of the site is used for irrigation (4,41).

### 5.3 SURFACE WATER

The potential for a release to surface water appears to be low because surface runoff from the site enters a ditch located more than 2,000 feet east of the site (1). This ditch runs south along Highway 99 until it outfalls into Morrison Creek located 0.75 miles south of the site (42). Morrison Creek flows perennially through the city of Sacramento. It travels approximately 6 miles from where the ditch outfalls into Morrison Creek before reaching a below sea level basin where its water is pumped into the Sacramento River. There are no drinking water intakes, but there is recreational fishing in Morrison Creek and the Sacramento River. Additionally, Morrison Creek and adjacent ponds are considered wetlands (43,44,45).

### 5.4 AIR

Hazardous substance sources currently on site appear to be adequately contained to prevent a release to air. The drums in the hazardous waste storage area are sealed, intact, and contained in a shed. In addition, contaminated soil is located beneath pavement (4,12).

The population within 4 miles of the site is approximately 187,300 (46).

### 5.5 SOIL EXPOSURE

The likelihood of an on-site exposure incident appears to be low because the hazardous waste storage area is enclosed within a padlocked shed and contains intact, sealed drums. In addition, contaminated soil is located beneath pavement (4).

There are no residences, schools, day care centers, or sensitive environments on site (4,47). Campbell Soup employs approximately 1,800 workers (4). The number of people living within 1 mile of the site is approximately 17,570 (46).

## 6. SUMMARY OF FIT INVESTIGATIVE ACTIVITIES

### 6.1 AGENCIES CONTACTED

FIT contacted the following agencies with inquiries into their involvement with the Campbell Soup site: RWQCB, DHS, and County Health.

### 6.2 RECONNAISSANCE OBSERVATIONS

Information gathered during the site reconnaissance is presented throughout this report. For additional information, refer to the Site Reconnaissance Interview and Observations Report in Appendix A and the photographs in Appendix B (4).

A site reconnaissance was conducted at Campbell Soup Company on June 6, 1991 by FIT members Juliet Shin and Kira Pyatt. The inspection began at 12:00 p.m. at the facility, where FIT met with Bob Cook, Randy Foster, Tom Duwe, Mark Elliott, and Lynn Cissell, all Campbell Soup Company employees. An interview was conducted, followed by a site tour (4).

A summary of observations made by FIT during the site tour is as follows:

- o Drums of solvent-based and water-based enamel waste, waste oil, spent Video Jet Ink, PCBs, and used batteries were observed in the hazardous waste storage area.
- o There were two inactive aboveground product tanks adjacent to the hazardous waste shed.
- o Approximately five 55-gallon drums of salt brine were being stored immediately outside of the hazardous waste storage area directly on the asphalt, prior to transport off site.
- o FIT toured the site of the 1990 diesel spill, and observed an excavated area where some soil had been removed.
- o A strong solvent odor was noted to be coming from the can manufacturing department.

## **7. EMERGENCY RESPONSE CONSIDERATIONS**

The National Contingency Plan [40 CFR 300.415(b)(2)] authorizes the Environmental Protection Agency to consider emergency response actions at those sites which pose an imminent threat to human health or the environment.

There is no apparent need for a referral to EPA's Emergency Response Section at this time because the hazardous waste storage area consists of a locked metal shed containing intact, sealed drums; and contaminated soil is located beneath pavement (4). Additionally, it appears that DHS and RWQCB are actively involved with the site (9,11,49).

## **8. SUMMARY OF HRS CONSIDERATIONS**

The Campbell Soup Company (Campbell Soup) site is located at 6200 Franklin Boulevard, Sacramento, California (1,3). The site covers approximately 123 acres in a mixed commercial and residential area (18).

Campbell Soup produces convenience food and juices at the site. Hazardous wastes are generated from the packaging operations and maintenance of machinery (4,7). These wastes (i.e., spent solvent-based and water-based enamels, spent solvents, waste oils, used batteries, spent Video Jet Ink, and PCBs) are stored in the hazardous waste storage area for more than 90 days prior to being transported off site (4).

It appears that hazardous substances from the site have been released to groundwater. In 1987 and 1988, up to 4.8 µg/L trichloroethylene was detected in on-site water supply well #2 (9). In addition, up to 2,280 µg/L xylenes, 16 µg/L toluene, 2 µg/L benzene, 250 µg/L ethyl benzene, 1.6 µg/L TCA, and 1.6 µg/l PCE have been detected in on-site monitoring wells MW-1 and MW-2 (12). There are three municipal drinking water systems located within 4 miles of the site. Together, these three systems serve a blend of surface water and groundwater to approximately 356,469 people within 4 miles of the site (35,36,37,38,39,40).

Surface runoff from the site enters a ditch that is located approximately 2,000 feet east of the site. This ditch discharges to Morrison Creek and runs for approximately 6 miles before discharging in the Sacramento River. There are no drinking water intakes, but there is some recreational fishing, in Morrison Creek and the Sacramento River. Additionally, Morrison Creek, and adjacent ponds, are considered wetlands (43,44,45).

Although there are approximately 1,800 workers on site daily, the potential for on-site exposure or a release to air appears to be low because the hazardous waste storage area is enclosed within a padlocked shed and contains intact, sealed drums. In addition, contaminated soil is located beneath pavement (4). The population within 1 mile of the site is approximately 17,570 (46).

The following are significant Hazard Ranking System factors associated with the Campbell Soup Company site:

- o There appears to have been a release of contaminants to an on-site drinking water well at concentrations exceeding health-based benchmarks;
- o There are approximately 1,800 workers on site daily; and
- o There are three municipal drinking water systems within 4 miles of the site that supply a blend of groundwater and surface water to approximately 356,469 people.

9. EPA RECOMMENDATION

	<u>Initial</u>	<u>Date</u>
No Further Remedial Action Planned under CERCLA	_____	_____
Higher-Priority SSI under CERCLA	_____	_____
Lower-Priority SSI under CERCLA	_____	_____
Defer to Other Authority (e.g., RCRA, TSCA, NRC)	<u>pa</u>	<u>9.17.91</u>

Notes:



## 10. REFERENCES

1. U.S. Geological Survey, map of Sacramento, California, 7.5-minute quadrangle, 1968 (photorevised 1980).
2. California Department of Health Services (DHS), inspection report, Campbell Soup Company, Sacramento, California, November 2, 1990.
3. DHS, inspection report, Campbell Soup Company, Sacramento, California, August 24, 1988.
4. Shin, Juliet, and Kira Pyatt, Ecology and Environment, Inc., Field Investigation Team (E & E FIT), site reconnaissance notes, Campbell Soup Company, Sacramento, California, June 6, 1991.
5. California Regional Water Quality Control Board (RWQCB), Central Valley Region, "Order No. 88-083, Waste Discharge Requirements For Campbell Soup Company, Sacramento County," May 20, 1988.
6. Cook, Bob, Campbell Soup Company, to Juliet Shin, E & E FIT, letter with facility map attached, June 14, 1991.
7. DHS, Hazardous Waste Facility Permit, Campbell Soup Company, Sacramento, California, effective date: April 6, 1987; expiration date: April 6, 1992.
8. Henao, Joseph, RWQCB, to Wayne Pierson, RWQCB, internal memorandum re: rescission of Order No. 88-129, Campbell Soup, Sacramento, California, September 10, 1990.
9. RWQCB, Larry Nash to Peter Haase, internal memorandum re: water supply well investigation at Campbell Soup, Sacramento, California, June 1, 1988.
10. Sinclair, D.J., Campbell Soup Company, to Peter Haase, RWQCB, letter re: monitoring well information, February 9, 1988.
11. RWQCB, meeting notes re: Campbell Soup Company-groundwater monitoring/assessment programs, September 14, 1989.
12. American Environmental Management Corporation, "Soil and Groundwater Investigation Report for Campbell Soup Company, Sacramento, California," August 27, 1987.
13. Gillis, Elizabeth, American Environmental Management Corporation, to Laura Campbell, Sacramento County Environmental Health Department, letter re: underground storage tank removal at Campbell Soup Company, Sacramento, California, Job No. 81160, June 21, 1989.
14. EPA, Part A Permit Application, Campbell Soup Company, Sacramento, California, dated November 7, 1980.

15. DHS, "Interim Status Document," Campbell Soup Company, Sacramento, California, effective date: March 30, 1981.
16. Cook, Bob, Campbell Soup Company, and Juliet Shin, E & E FIT, telephone conversation, May 22, 1991.
17. DHS, "Hazardous Waste Surveillance and Enforcement Report," Campbell Soup Company, Sacramento, California, June 3, 1985.
18. DHS, "Hazardous Waste Surveillance and Enforcement Report," Campbell Soup Company, Sacramento, California, January 29, 1987.
19. DHS, "Hazardous Waste Management Report," Campbell Soup Company, Sacramento, California, May 29, 1985.
20. DHS, inspection report, Campbell Soup Company, Sacramento, California, September 23, 1981.
21. DHS, "Hazardous Waste Surveillance and Enforcement Report," Campbell Soup Company, Sacramento, California, May 10, 1986.
22. DHS, inspection report, Campbell Soup Company, Sacramento, California, May 27, 1982.
23. Posner, Stephen, DHS, to Brad Parsons, DHS, internal memorandum re: Campbell Soup facility, dated November 17, 1982.
24. Stahler, James, DHS, to Thomas Malson, Campbell Soup Company, letter re: corrections to violations, January 25, 1983.
25. Sacramento Regional County Sanitation District, Industrial Sewer Use Permit, Campbell Soup Company, Sacramento, California, April 22, 1987.
26. Luma, Gloria, Sacramento County Environmental Health Department, and Juliet Shin, E & E FIT, telephone conversation, June 18, 1991.
27. Yee, Jimmie, Cole/Yee/Schubert & Associates, to Doug Sinclair, Campbell Soup Company, letter re: design and construction of container storage area, June 10, 1983.
28. DHS, inspection report, Campbell Soup Company, Sacramento, California, photos, inspected by Sam Zarek, May 29, 1985
29. Romic Chemical, sample profile sheet for water-based paint rinse water, Campbell Soup Company, Sacramento, California, September 10, 1990.
30. Cook, Bob, Campbell Soup Company, and Juliet Shin, E & E FIT, telephone conversation, June 19, 1991.

31. Campbell Soup Company, "Contingency Plan and Emergency Procedures for the Protection of Groundwater and Surface water in the Event of Spills and Unplanned Discharges to Land," Sacramento, California, October 1985.
32. Sinclair, D.J., Campbell Soup Company, to Larry Nash, RWQCB, letter re: Campbell Soup Company, groundwater supply wells investigation, August 15, 1988.
33. U.S. Geological Survey, "Geologic Features and Ground-Water Storage Capacity of the Sacramento Valley California," Water-Supply Paper 1497.
34. Johnson, Karen, "Chemical Quality of Groundwater In Sacramento and Western Placer Counties, California," United States Geological Survey, Water Resources Investigations, Report 85-4164, Sacramento, California, November 1985.
35. Short, Walter, City of Sacramento, and Toner Mitchell, E & E FIT, telephone conversation, December 3, 1990.
36. Martello, Betty, Florin County Water Department, and Juliet Shin, E & E FIT, telephone conversation, May 14, 1991.
37. Haskell, Betty, Fruitridge Vista Water Company, and Juliet Shin, E & E FIT, telephone conversation, May 14, 1991.
38. Luhdorff and Scalmanini Consulting Engineers, "SAWWA 1988 Title 22-AB 1803 Groundwater Basin Monitoring Program, Sheet 1, LSCE 88-2-070."
39. Compass Maps, Inc., Wells and Sumps of Sacramento, DRWG. No. 7-31, Sacramento, California, Copyright MCMLXVII Edition of 1985.
40. Kraft, Mark, City of Sacramento, and Juliet Shin, E & E FIT, telephone conversation, May 14, 1991.
41. Short, Walt, City of Sacramento, and Kira Pyatt, E & E FIT, telephone conversation, November 27, 1990.
42. Blackwood, Church, Sacramento County Public Works Department, and Juliet Shin, E & E FIT, telephone conversation, May 14, 1991.
43. Santin, Ray, City of Sacramento Public Works Department, and Kimberly Bell, E & E FIT, telephone conversation, September 15, 1989.
44. Coppola, John, Sacramento County Water Resources Division, and Kimberly Bell, E & E FIT, telephone conversation, October 31, 1989.
45. Fjelstad, Maury, Department of Fish and Game, and Kimberly Bell, E & E FIT, telephone conversation, September 15, 1989.

46. U.S. EPA, Office of Toxic Substances, "Graphical Exposure Modeling System," March 1989.
47. California Department of Fish and Game, "Natural Diversity Data Base," Sacramento quadrangle.
48. Sinclair, D.J., Campbell Soup Company, to Mr. Duwe, Campbell Soup Company, internal memorandum re: diesel fuel spill into containment area, August 20, 1987.
49. Hong, Eric, DHS, and Juliet Shin, E & E FIT, telephone conversation, May 23, 1991.

**APPENDIX A**

**CONTACT LOG AND REPORTS**

CONTACT LOG

Facility Name: Campbell Soup Company  
Facility ID: CAD009198367

Name	Affiliation	Phone #	Date	Information
Ray Santin	City of Sacramento	(916) 449-5226	9/15/89	See Contact Report.
Maury Fjelstad	Resources Agency	(916) 355-7090	9/15/89	See Contact Report.
John Coppola	Sacramento County Water Division	(916) 440-6851	10/31/89	There are no drinking water intakes from the Sacramento River, in Sacramento County, after the point where Morrison Creek water enters the Sacramento River.
Dave Kohlhorst	California Dept. of Fish and Game	(209) 466-4421	8/22/90	See Contact Report.
Fred Meyers	California Dept. of Fish and Game	(916) 355-7090	8/27/90	See Contact Report.
Walt Short	City of Sacramento	(916) 449-8730	11/27/90	See Contact Report.
Walt Short	City of Sacramento	(916) 449-8730	12/3/90	See Contact Report.
Gloria Luma	Sacramento County Environmental Health Department	(916) 386-6160	5/14/91	The County Health Department has files on Campbell Soup.
Wayne Pierson	RWQCB	(916) 361-5629	5/14/91	RWQCB has files on Campbell Soup Company.
Alberta Mac-Murray	DHS	(916) 855-7700	5/14/91	DHS has files on Campbell Soup Company.
Chuck Blackwood	Sacramento County Public Works Dept.	(916) 440-6851	5/14/91	See Contact Report.
Betty Haskell	Fruitridge Valley Water Company	(916) 443-2607	5/14/91	See Contact Report.

js/campbell/clcr

Betty Martello	Florin County Water Department	(916) 383-0808	5/14/91	See Contact Report.
Mark Kraft	City of Sacramento	(916) 449-5604	5/14/91	See Contact Report.
Bob Cook	Campbell Soup Company	(916) 395-5045	5/22/91	See Contact Report.
Eric Hong	DHS	(916) 855-7726	5/23/91	See Contact Report.
Bob Cook	Campbell Soup Company	(916) 395-5045	6/6/91	Site Reconnaissance Interview and Observations
Gloria Luma	Sacramento County Environmental Health Department	(916) 386-6178	6/18/91	See Contact Report.
Bob Cook	Campbell Soup Company	(916) 395-5045	6/19/91	See Contact Report.
Mark Elliott	Campbell Soup Company	(916) 428-7890	8/15/91	All the on-site supply wells are interconnected.

# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> Sacramento City of Public Works Department		
<b>DEPARTMENT:</b> A Division-Flood Control and Sewers		
<b>ADDRESS/CITY:</b> 1391 35th Avenue, Sacramento		
<b>COUNTY/STATE/ZIP:</b> Sacramento, California 95822		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Ray Santin	Operations Superintendent	(916) 449-5226
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Kim Bell		<b>DATE:</b> 9/15/89
<b>SUBJECT:</b> Morrison Creek		
<b>SITE NAME:</b> Campbell Soup Company *		<b>EPA ID#:</b> CAD009198367

The water in Morrison Creek is not treated until after it is pumped into the Sacramento River.

Mr. Santin believes some farmers use creek water for irrigation of crops. He said to double check with another agency, because he is not certain.

\* Contact Report was originally prepared for the Sacramento Surplus Sales site, CAD980881254.



# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> Resources Agency		
<b>DEPARTMENT:</b> Department of Fish and Game		
<b>ADDRESS/CITY:</b> 1701 Nimbus Road, Suite A, Rancho Cordova		
<b>COUNTY/STATE/ZIP:</b> Sacramento, California 95670		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Maury Fjelstad	District Fishery Biolog.	(916) 355-7090
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Kim Bell		<b>DATE:</b> 9/15/89
<b>SUBJECT:</b> Morrison Creek		
<b>SITE NAME:</b> Campbell Soup Company *		<b>EPA ID#:</b> CAD009198367

The entire creek is considered a wetland, as are the lakes connected to it.

The creek was planted with the following fish in 1955: white catfish, bluegill, warmouth, and brown bullhead.

The creek probably has other warm water fish it has gained from other water bodies that flow into it.

Only recreational fishing occurs in Morrison Creek. No commercial fishing occurs.

\* Contact Report was originally prepared for the Sacramento Surplus Sales site, CAD980881254.

# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> California Department of Fish and Game		
<b>DEPARTMENT:</b> Fisheries		
<b>ADDRESS/CITY:</b> 1701 Nimbus Road		
<b>COUNTY/STATE/ZIP:</b> Rancho Cordova, California 95670-4503		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Dave Kohlhorst	Fishery Biologist	(209) 466-4421
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Kira Pyatt		<b>DATE:</b> 8/22/90
<b>SUBJECT:</b> Fishery in Sacramento River		
<b>SITE NAME:</b> Campbell Soup Company *		<b>EPA ID#:</b> CAD009198367

The California Department of Fish and Game have studied anadromous fish populations in the Sacramento River. The estimated sturgeon catch for the American and Sacramento Rivers is about 4,500 pounds per year (lb/yr). The striped bass catch is 52,000 lb/yr. This estimate is taken from Courtland to the mouth of the Feather River (approximately 45 miles).

\* Contact Report was originally prepared for the Sacramento Municipal Landfill site, CAD981382161.

# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> City of Sacramento		
<b>DEPARTMENT:</b> Water and Sewer Department		
<b>ADDRESS/CITY:</b> 1391 35th Avenue, Sacramento		
<b>COUNTY/STATE/ZIP:</b> Sacramento, California 95822		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Walt Short		(916) 449-8730
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Kira Pyatt		<b>DATE:</b> 11/27/90
<b>SUBJECT:</b> Well use within 4 miles of the landfill		
<b>SITE NAME:</b> Campbell Soup Company *		<b>EPA ID#:</b> CAD009198367

Seventeen percent of the overall water supply for the City of Sacramento is groundwater. The average depth of wells in Sacramento are 250 to 300 feet.

Wells that are in use year round with heavy use: 157, 156, 116, 159, 91, 158, 143, 120, 122, 124, 123, 159, 94, 93, 92, 129, 134, 138, 131, 155, 126, 135, 136, 127, 144, 151.

Wells which are used with minimal frequency: 114, 112, 110, 111, 142, 109, 117, 119, 132.

Wells which are used for irrigation: 20, 1, 2, 4, 3, 41, 50, 48, 61.

Wells which are no longer used: 161, 8, 125, 141, 140, 139, 146.

There are 43 active drinking water wells in the Sacramento Water District and a population of 346,600 people served (111,785 residences are served as of 1989). Well number 132 is on restricted use and well number 150 is abandoned because of contamination from McClellan Air Force Base. There are 20 active irrigation wells in the Sacramento Water District.

\* Contact Report was originally prepared for the Sacramento Municipal Landfill site, CAD981382161.

# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> City of Sacramento		
<b>DEPARTMENT:</b> Public Works		
<b>ADDRESS/CITY:</b> Sacramento		
<b>COUNTY/STATE/ZIP:</b> Sacramento, California		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Walter Short		(916) 449-8730
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Toner Mitchell		<b>DATE:</b> 12/3/90
<b>SUBJECT:</b> Groundwater		
<b>SITE NAME:</b> Campbell Soup Company *		<b>EPA ID#:</b> CAD009198367

The City of Sacramento operates 43 production wells. These wells provide approximately 17 percent of Sacramento's drinking water. The rest of the city's water comes from the American River. The City of Sacramento serves approximately 340,000 people with drinking water.

\* Contact Report was originally prepared for the Auto Wrecking Yard site, CAD982358277.

# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> Arcade County Water District		
<b>DEPARTMENT:</b>		
<b>ADDRESS/CITY:</b> Sacramento		
<b>COUNTY/STATE/ZIP:</b> Sacramento, California		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Roy Hafar		(916) 972-7171
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Toner Mitchell		<b>DATE:</b> 12/12/90
<b>SUBJECT:</b> Water supply information		
<b>SITE NAME:</b> Campbell Soup Company *		<b>EPA ID#:</b> CAD009198367

Arcade County Water District operates 59 wells, all of which are screened between 300 and 400 feet below ground surface. Mr. Hafar estimates that the District serves approximately 100,000 people with drinking water.

\* Contact Report was originally prepared for the Auto Wrecking Yard site, CAD982358277.

# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> Florin County Water Department		
<b>DEPARTMENT:</b>		
<b>ADDRESS/CITY:</b> P.O. Box 28177, Sacramento		
<b>COUNTY/STATE/ZIP:</b> Sacramento, California 95828		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Betty Martello		(916) 383-0808
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Juliet Shin		<b>DATE:</b> 5/14/91
<b>SUBJECT:</b> Number of wells and people served		
<b>SITE NAME:</b> Campbell Soup Company		<b>EPA ID#:</b> CAD009198367

There are nine wells in the system that serves 2,209 connections with solely groundwater.

# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> City of Sacramento		
<b>DEPARTMENT:</b> Advanced Planning Department		
<b>ADDRESS/CITY:</b> 1231 I Street, 3rd Floor, Sacramento		
<b>COUNTY/STATE/ZIP:</b> Sacramento, California		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Mark Kraft	Planner	(916) 449-5604
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Juliet Shin		<b>DATE:</b> 5/14/91
<b>SUBJECT:</b> Average Population per household		
<b>SITE NAME:</b> Campbell Soup Company		<b>EPA ID#:</b> CAD009198367

The average population per household in Sacramento as of 1990, from the Department of Finance, is 2.41 people.

# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> Fruitridge Valley Water Company		
<b>DEPARTMENT:</b>		
<b>ADDRESS/CITY:</b> 1108 2nd Street, Sacramento		
<b>COUNTY/STATE/ZIP:</b> Sacramento, California 95814		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Betty Haskell		(916) 443-2607
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Juliet Shin		<b>DATE:</b> 5/14/91
<b>SUBJECT:</b> Number of wells and people served		
<b>SITE NAME:</b> Campbell Soup Company		<b>EPA ID#:</b> CAD009198367

There are 15 wells in this system which serve approximately 4,625 connections with groundwater only.



# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> Sacramento County Public Works		
<b>DEPARTMENT:</b> Water Resources Department		
<b>ADDRESS/CITY:</b> 827 7th Street, Sacramento		
<b>COUNTY/STATE/ZIP:</b> Sacramento, California 95814		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Chuck Blackwood	Plan Checker	(916) 440-6851
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Juliet Shin		<b>DATE:</b> 5/14/91
<b>SUBJECT:</b> Floodplain and surface runoff from site		
<b>SITE NAME:</b> Campbell Soup Company		<b>EPA ID#:</b> CAD009198367

Campbell Soup Company is in the County of Sacramento. The majority of the site is in a temporary floodplain that is subject to a 500-year flood if the levees in Sacramento River and the American River were to break. This would affect Morrison Creek near the site.

It appears that surface runoff from the area of the site would drain into the ditch that runs along Highway 99. The ditch runs south along Highway 99 and eventually enters into Morrison Creek. Morrison Creek eventually outfalls into the Sacramento River.

# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> Campbell Soup Company		
<b>DEPARTMENT:</b>		
<b>ADDRESS/CITY:</b> 6200 Franklin Boulevard, Sacramento		
<b>COUNTY/STATE/ZIP:</b> Sacramento, California 95824		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Bob Cook	Reg. Dir. of Safety & Env.	(916) 395-5045
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Juliet Shin		<b>DATE:</b> 5/22/91
<b>SUBJECT:</b> Site reconnaissance		
<b>SITE NAME:</b> Campbell Soup Company		<b>EPA ID#:</b> CAD009198367

Campbell Soup Company in Sacramento has petitioned to have its TSDF status removed. The facility is working with DHS to implement this. A letter was sent to Mr. Ryan at DHS on November 20, 1990 requesting the nullification of the facility's TSDF status. DHS told the facility that it would take six months for a response.

Campbell Soup Company's FAX number is (916) 421-6125.

The site reconnaissance was scheduled for June 6, 1991 at 12:00 p.m. Beards are not allowed in some areas of the facility. Appropriate work clothing is required for the site tour, such as boots and hard hat. Hearing and hair protection is to be provided.

# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> Campbell Soup Company		
<b>DEPARTMENT:</b>		
<b>ADDRESS/CITY:</b> 6200 Franklin Boulevard, Sacramento		
<b>COUNTY/STATE/ZIP:</b> Sacramento, California		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Bob Cook	Reg. Dir. of Safety & Env.	(916) 395-5045
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Juliet Shin		<b>DATE:</b> 5/22/91
<b>SUBJECT:</b> Site Reconnaissance		
<b>SITE NAME:</b> Campbell Soup Company		<b>EPA ID#:</b> CAD009198367

Campbell Soup has petitioned to have its TSDF status removed. The facility is working with DHS to implement this. A letter was sent to Mr. Ryan of DHS on November 20, 1990 requesting the nullification of the facility's TSDF status. DHS told the facility that it would take six months for a response.

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The site reconnaissance was scheduled for June 6, 1991 at 12:00 p.m. Beards are not allowed in some areas of the facility. Appropriate work clothing is required for a tour (such as boots, hard hat). Hearing and hair protection will be provided.

# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> California Department of Health Services		
<b>DEPARTMENT:</b>		
<b>ADDRESS/CITY:</b> 10151 Croyden Way, Suite 3, Sacramento		
<b>COUNTY/STATE/ZIP:</b> Sacramento, California 95827		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Eric Hong		(916) 855-7726
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Juliet Shin		<b>DATE:</b> 5/23/91
<b>SUBJECT:</b> Request for withdrawal of TSDF status		
<b>SITE NAME:</b> Campbell Soup Company		<b>EPA ID#:</b> CAD009198367

DHS issued a Hazardous Waste Facility Permit to the facility in 1987. Campbell Soup submitted a Closure Plan in the same year. DHS has approved the Closure Plan. In order to withdraw its TSDF status, Campbell Soup must conduct closure along the lines of the approved Closure Plan. Campbell Soup has not yet begun closure.

Campbell Soup had a still on site to burn virgin product to produce steam as part of its production. Campbell considered using this still to reuse the solvents on site. It probably was never used for that purpose because Campbell Soup would have had to obtain additional permits to use the still for that purpose and it did not want to bother with the complications.

# SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT

Ecology and Environment, Inc.		
Field Investigation Team (FIT)		
160 Spear Street, Suite 1400		
San Francisco, California 94105		
(415) 777-2811		
<b>E &amp; E PERSON(S) CONDUCTING INTERVIEW AND MAKING OBSERVATIONS:</b>		
Juliet Shin and Kira Pyatt		
<b>FACILITY REPRESENTATIVE(S):</b>	<b>TITLE:</b>	<b>PHONE:</b>
Bob Cook	Environmental Engineer	(916) 395-5045
<b>SITE NAME:</b> Campbell Soup Company		<b>DATE:</b> 6/6/91
<b>CITY/STATE:</b> Sacramento, California		<b>EPA ID#:</b> CAD009198367

## The following information was obtained during the interview:

Campbell Soup employees at the meeting were Bob Cook, Randy Foster, Tom Duwe, Mark Elliott, and Lynn Cissell.

The Campbell Soup site has a National Pollutant Discharge Elimination System (NPDES) permit that was issued to them on February 9, 1988 to allow for discharge of cooling water from the heat exchangers into the storm drains. Campbell Soup has requested withdrawal of its TSD status. It sent a letter to DHS on November 20, 1990. Currently, Campbell Soup is still storing hazardous waste on site for over 90 days. Campbell Soup originally began storing over 90 days because it generated a small amount of waste and it wanted to accumulate a large amount of waste before hauling because it would save money. Now, Campbell Soup feels that it will be less problematic for the company if wastes are stored for less than 90 days and it withdraws its TSD status.

The facility has one underground tank to store Stoddard solvent product. Campbell Soup will probably phase this out soon. This tank was installed in 1987.

Solvent-based wastes were generated from the can manufacturing department. A small amount of solvent-based waste was also generated in the machine shops. Campbell Soup ceased generating the solvent-based waste in early 1991. The facility also generates a

water-based paint residue that comes from cleanup. In addition, the facility used to generate a paint rinse water solution two to three years ago. All the solvents are stored in the hazardous waste area. This waste typically goes to Romic Chemical Corporation in Palo Alto for recycling. Very recently Campbell Soup switched to Romic. Prior to Romic, the waste was hauled by American Environmental Management Corporation (American Environmental). Approximately 55 55-gallon drums (2,500 gallons) of this waste accumulated since November 1990 at the site.

Waste oils are generated at the site from the maintenance of equipment. The waste oil is sent to a local recycler, Ramos Oil, in Sacramento.

The Campbell Soup building is filled with asbestos. The company knows where the asbestos is and removes it as needed (e.g., when piping needs to be removed or when there are modifications to the building). On-site bailers were recently removed along with some asbestos.

Spent forklift batteries are stored at the site. Campbell Soup used to have them hauled as waste, but now they sell them. The battery acid is not separated from the batteries. The batteries are stored in the hazardous waste shed. They are not stored for more than one year.

Campbell Soup attempted to recycle its solvents in 1987 or 1988 with an on-site still, which is located inside a building. The still caught on fire, and Campbell Soup subsequently ceased using it.

Campbell Soup listed tank bottom wastes in its Operation Plan. The tank bottom wastes refer to the facility's salt brine system where impurities from the salt that is brought in settles out. Campbell Soup does not feel that it needs to haul this as waste. Currently, the tank-bottom wastes are being stored in drums in the vicinity of the Hazardous Waste Storage Area. Romic is currently taking samples of this waste to see if it needs to be hauled as waste. American Environmental hauled this as waste in the past.

Five to 10 gallons per month of Vedeo Jet Ink is generated at the site. This ink contains methyl ethyl ketone (MEK) and is hauled by Romic Chemicals. The waste ink is stored in drums in the Hazardous Waste Storage Area. The ink waste is generated from the labeling process.

Caustic tanks were listed in Campbell Soup's Operation Plan. The caustic tanks are storage tanks for sodium hydroxide and chlorine which the facility receives in bulk. These tanks are inspected by OSHA.

The maximum capacity of the hazardous waste storage area is 200 55-gallon drums. This area covers approximately 50 feet x 60 feet. It is concrete-paved and surrounded by a 6 inch curb or berm.

A small amount of solvent waste was collected in drums in the parts storage area on site. This area could have contained up to six 55-gallon drums of solvents. Campbell Soup stopped storing drums in this area approximately three years ago.

The facility has been at the site since 1948. The site was probably just a field before Campbell Soup took it over. Campbell Soup's headquarters are in Camden, New Jersey.

There are six domestic/industrial wells on site. Additionally there are monitoring wells on site. The number of wells will probably be given in the report by American Environmental.

A diesel spill occurred at the site in 1990 near where diesel fuel is pumped because the pump was left on unguarded. American Environmental cleaned it up and Sacramento County Health Department approved the clean up. At most 20 to 30 gallons of diesel was spilled. The diesel spilled on to the soil. Another diesel spill occurred in 1987 at the site. Three hundred gallons of diesel ran into the bermed containment area around the diesel tanks. Bob Cook will give me a copy of a letter pertaining to this spill.

In approximately 1987, a leaky underground tank containing solvent-based enamel product initiated groundwater monitoring at the site. The information regarding this tank should be in the report prepared by American Environmental. There have been four or five underground product storage tanks that have been pulled out in the past and two that were buried. Bob Cook will get me a copy of the letter that discusses the closure of these product tanks.

There used to be three fenced transformer units that were located near the powerplant on site. These were owned by the Sacramento Municipal Utilities District and were removed approximately four years ago. Presently, there are light ballast transformers on site that contain small amounts of polychlorinated biphenyls (PCBs). The light ballasts containing the PCBs are collected in a 35-gallon drum which is stored in the hazardous waste shed. The PCBs are hauled to Kettleman Hills.

An insecticide, called Cardinal S.F.-1, is stored in the pesticide storage building on site and is used to fight insects at the facility. A maximum of 550 gallons of this insecticide could be stored in the pesticide storage building at the site. Methyl bromide is also stored in the pesticide storage building and is used for fumigation.

Campbell Soup has a permit to discharge to the sewer system. This permit was issued in 1987.

Campbell Soup does not have a certification by an engineer that the site has adequate containment for a 500-year flood.

The whole site is paved except for a 17-acre field.

There are 1,800 workers on site daily.

**The following observations were made during the site reconnaissance visit:**

There are a number of satellite collection areas for spent water-based and solvent-based enamel throughout the can manufacturing department on

site. These locations are shown on the facility map that will be made available to FIT once Bob Cook gets his supervisor's approval. FIT looked at one collection area. In this collection area, water-based enamel from the manufacturing of cans, is allowed to drip into a bucket. When this bucket is full, it is manually poured into an adjacent 55-gallon drum through a funnel. Once the drum is full, it is taken, by forklift, to the hazardous waste shed. According to Mr. Cook, all the on-site collection areas are run basically like this one.

The waste shed has been at the facility for 4 to 5 years. Before that the drums were stored outside on a concrete pad in the same general area. It is unknown if this area was fenced or bermed. Solvent-based and water-based enamel waste and waste oil are stored in this area. Empty drums are stored in this area for reuse. The waste oil and water-based solvent drums are reused. Romic comes and pumps the drums until they are empty. The solvent-based enamel drums are hauled. Additionally, at the time of the FIT recon, there were three product drums of deodorized beef fat, one 35-gallon PCB drum, three empty drums, one 55-gallon drum of Vedeo Jet Ink and cleaner, and used batteries stored in this area. The used batteries are stored in a wooden container with a lid. All the drums are sealed and in good condition.

Asbestos is stored on site in a trailer near the hazardous waste shed.

There are two inactive tanks adjacent to the hazardous waste shed that are used to store caustics or solvents. Campbell Soup does not know what it will do with these tanks yet.

There are a great deal of sparrows in the hazardous waste shed.

At the time of the site reconnaissance, there were about five 55-gallon drums of salt bryne immediately outside of the hazardous waste shed.

Alongside the hazardous waste shed, there is an empty drum storage area which covers approximately 150 square feet. Ultra violet enamel, oil, and grease drums are stored there. Capital Drum comes and picks up all the empty drums. This area is on a raised concrete pad, approximately 6 inches high, and is fenced on three sides. Used equipment is stored adjacent to the empty drum storage area in an area of approximately 300 square feet.

FIT observed the area where the 1990 diesel spill occurred. FIT observed where the cleanup occurred and noticed where some soil had been removed.

Campbell Soup owns approximately 17 acres of field adjacent to the hazardous waste shed, on the northwest corner of the facility. This field is not currently used. It was used historically to discharge tomato water.

FIT noticed a strong solvent odor outside of the container building.

There is a 4,000-gallon underground tank for holding product Stoddard



solvent located on one side of the container building. This tank was installed in 1987 or 1988. It is a fiber glass, double-walled tank. Adjacent to this are two tanks used to store product water-based enamel. There are 2-foot berms around these two tanks.

The Sacramento County Health Department inspects the site regularly (twice last year) because Campbell Soup has hazardous wastes on site.

Campbell Soup is bordered on the east by Franklin Boulevard, on the south by 47th Avenue, on the west by Western Pacific Railroad, and on the north by 39th Avenue.

# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> Sacramento County		
<b>DEPARTMENT:</b> Environmental Health Department		
<b>ADDRESS/CITY:</b> Sacramento		
<b>COUNTY/STATE/ZIP:</b> Sacramento, California		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Gloria Luma		(916) 386-6178
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Juliet Shin		<b>DATE:</b> 6/18/91
<b>SUBJECT:</b> County's involvement with site		
<b>SITE NAME:</b> Campbell Soup Company		<b>EPA ID#:</b> CAD009198367

The Sacramento County Health Department (County Health) issued Campbell Soup Company a Hazardous Materials Permit in July 1, 1990, because Campbell Soup Company exceeds the reportable quantities of hazardous waste at its site. County Health conducted an inspection at the site on May 24, 1990. At that time, County Health noted that hazardous waste drums were not labeled properly and that there were some hazardous waste drums without lids on site. County Health issued a permit to the facility in about 1988 for one 1,000-gallon underground product Stoddard solvent tank. County Health inspects the site once each year because of the underground tank.

# CONTACT REPORT

<b>AGENCY/AFFILIATION:</b> Campbell Soup Company		
<b>DEPARTMENT:</b>		
<b>ADDRESS/CITY:</b> 6200 Franklin Boulevard, Sacramento		
<b>COUNTY/STATE/ZIP:</b> Sacramento, California		
<b>CONTACT(S)</b>	<b>TITLE</b>	<b>PHONE</b>
1. Bob Cook	Reg. Dir. of Safety & Env.	(916) 395-5045
2.		
<b>E &amp; E PERSON MAKING CONTACT:</b> Juliet Shin		<b>DATE:</b> 6/19/91
<b>SUBJECT:</b> Operations at the site		
<b>SITE NAME:</b> Campbell Soup Company		<b>EPA ID#:</b> CAD009198367

The parts storage area was located in the plant storeroom at the site. The container department store room located on the facility map sent to FIT is used for small quantity storage of unopened 55-gallon drums of enamels and oils. The container department storage area #1 is used to store bulk quantities of enamels. This area consists of a 1,000-gallon, above-ground tank that is probably bermed. This tank may not be in use anymore. The production chemical storeroom on the facility map was used to store dry chemicals. It is probably not used any longer because Campbell Soup Company switched over to liquid chemicals in bulk quantities. This area is fenced and locked, and is located on the fourth floor of a building.

The caustic tanks on site are located immediately south of W-35 on the map, which is in the area of the garbage dock room.

Two underground solvent tanks used to be located near the current underground solvent tank on site. The other two underground solvent tanks were located roughly midway between W-8A and W-20 on the facility map.

## **APPENDIX B**

### **PHOTODOCUMENTATION**

FIELD PHOTOGRAPHY LOG SHEET

DATE: June 6, 1991

TIME: 1:30 PM

DIRECTION:

east

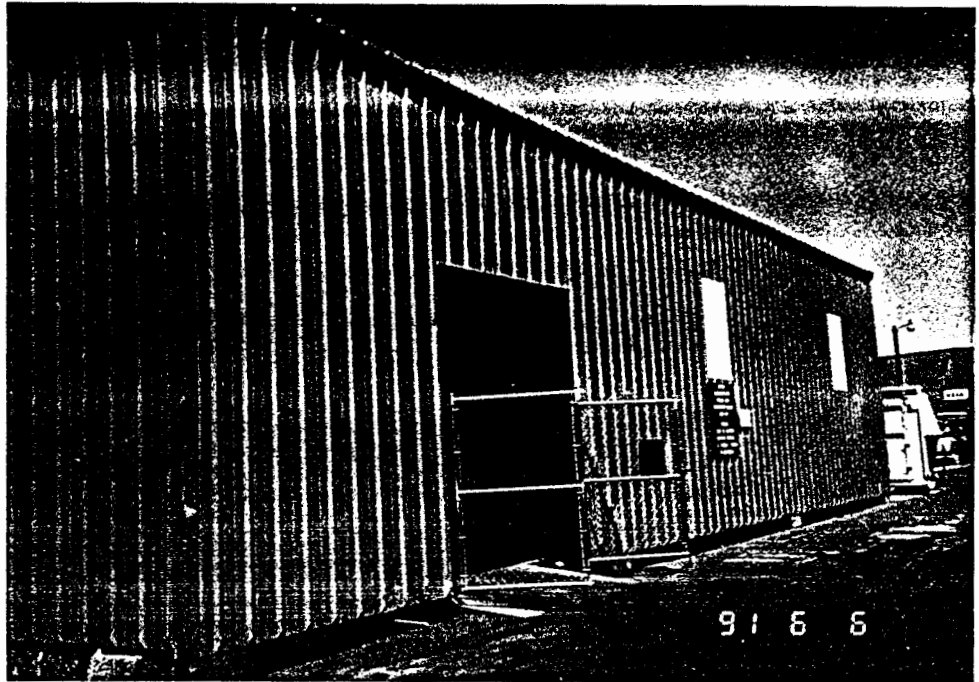
WEATHER:

sunny and warm

PHOTOGRAPHED BY:

Juliet Shin

DESCRIPTION:



This is the facility's hazardous waste shed, located in the western portion of the site

---

DATE: June 6, 1991

TIME 1:30 PM

DIRECTION:

east

WEATHER:

warm and sunny

PHOTOGRAPHED BY:

Juliet Shin

DESCRIPTION:



Inside of the facility's hazardous waste shed.

---

FIELD PHOTOGRAPHY LOG SHEET

DATE: June 6, 1991

TIME: 1:45 PM

DIRECTION:

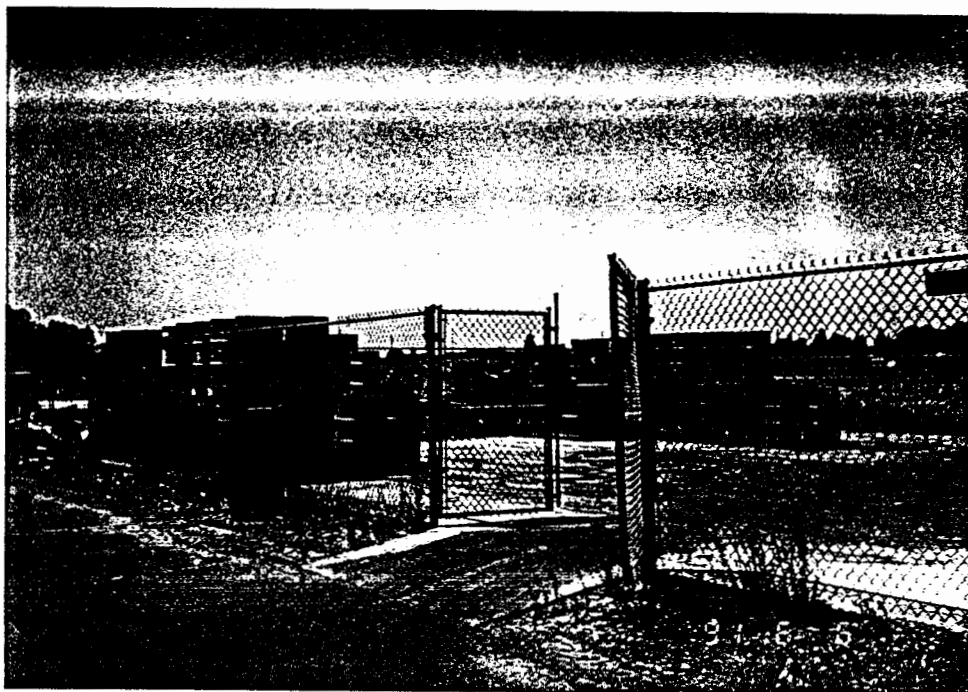
north

WEATHER:

warm and sunny

PHOTOGRAPHED BY:

Juliet Shin



DESCRIPTION:

This is the empty drum storage area that is located adjacent to the hazardous waste shed. It is fenced on three sides.

DATE: June 6, 1991

TIME 1:47 PM

DIRECTION:

north

WEATHER:

warm and sunny

PHOTOGRAPHED BY:

Juliet Shin



DESCRIPTION:

Used equipment is stored adjacent to the empty drum storage area in an area covering approximately 300 square feet.

FIELD PHOTOGRAPHY LOG SHEET

DATE: June 6, 1991

TIME: 1:55 PM

DIRECTION:

north

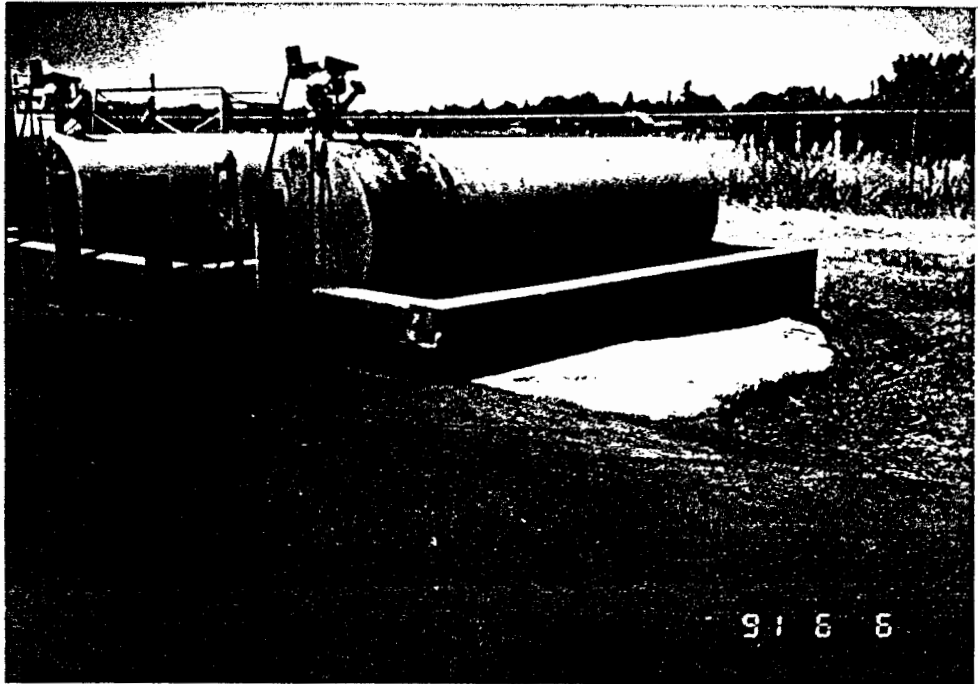
WEATHER:

warm and sunny

PHOTOGRAPHED BY:

Juliet Shin

DESCRIPTION:



Two diesel tanks used to fuel facility's equipment. Note the trenched area of excavated soil alongside the tanks. This was the result of cleanup action for a diesel spill.

DATE: June 6, 1991

TIME 2:00 PM

DIRECTION:

east

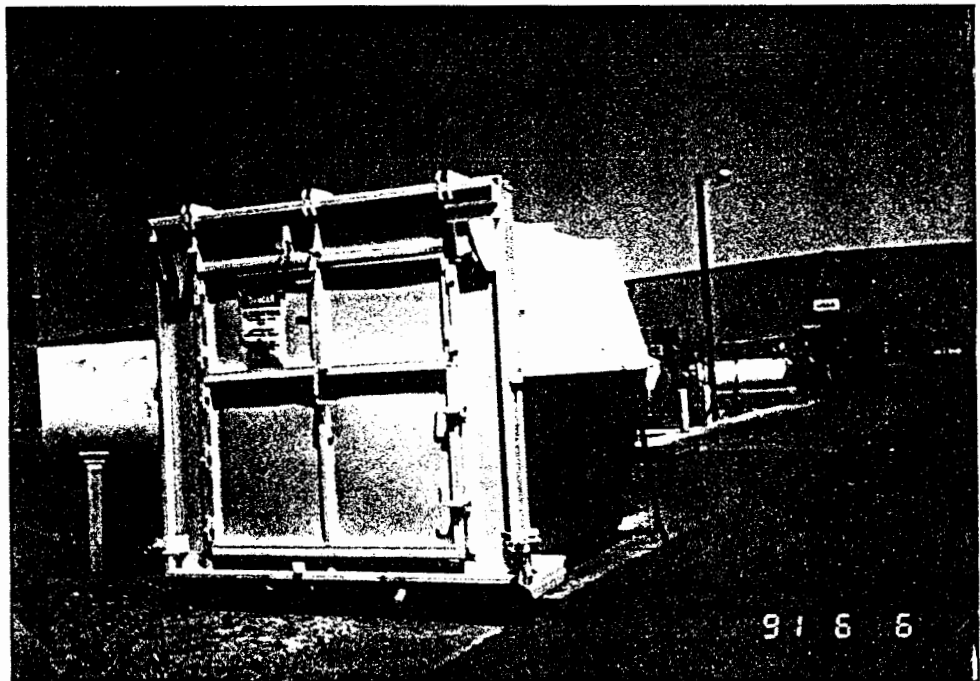
WEATHER:

warm and sunny

PHOTOGRAPHED BY:

Juliet Shin

DESCRIPTION:



The facility's asbestos containment. Some portions of the Campbell Soup Company still have asbestos in them. When pipes need to be replaced, the asbestos is removed with them and stored in the asbestos containment area until hauled off site.

js/campbell/fpls

FIELD PHOTOGRAPHY LOG SHEET

DATE: June 6, 1991

TIME: 2:15 PM

DIRECTION:

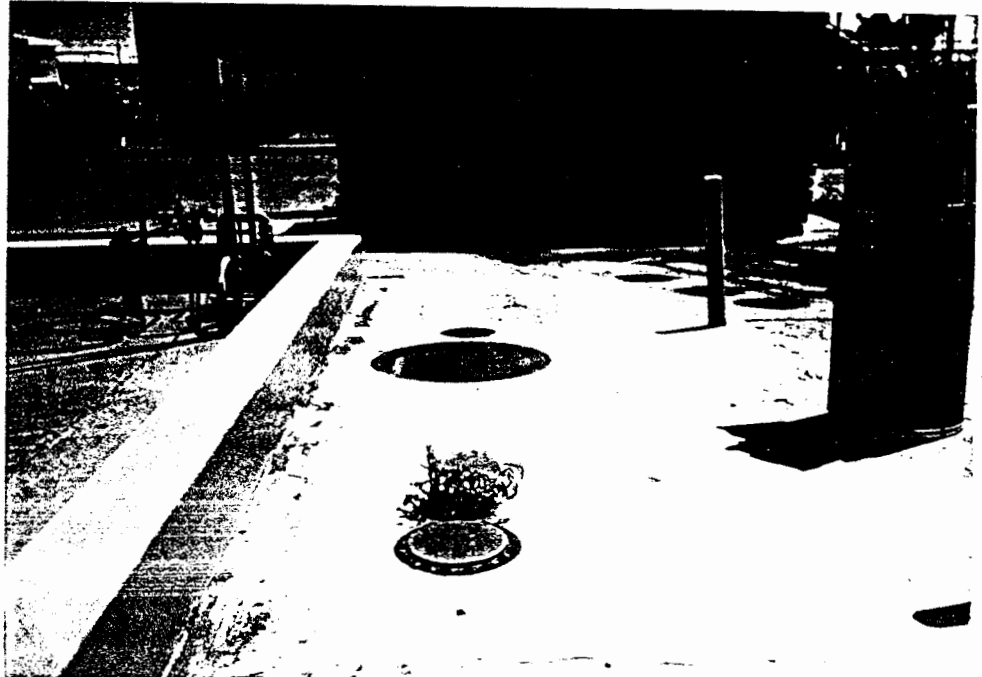
east

WEATHER:

warm and sunny

PHOTOGRAPHED BY:

Juliet Shin



DESCRIPTION:

The location of the underground product stoddard solvent tank.

DATE: June 6, 1991

TIME 2:15 PM

DIRECTION:

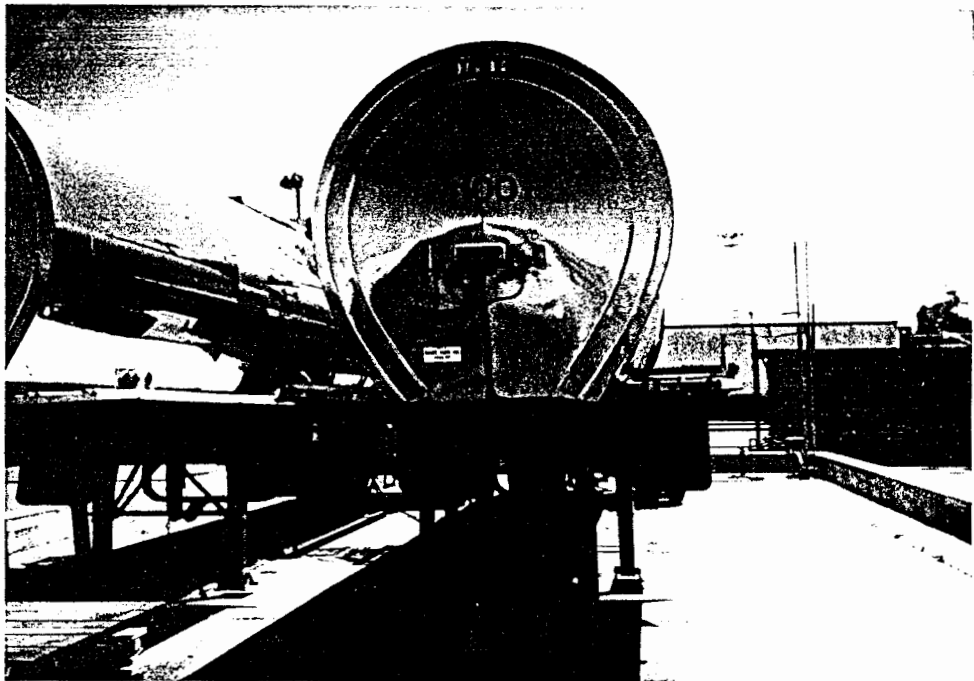
east

WEATHER:

warm and sunny

PHOTOGRAPHED BY:

Juliet Shin



DESCRIPTION:

Two tanks used to store product water-based enamel. A berm surrounds these tanks.